Docket Nos.: 50-259/260/296

### JAN 0 3 1986

MEMORANDUM FOR: Daniel R. Muller, Director, BWR PD#2, DBL

FROM: Richard J. Clark, Project Manager, BWR PD#2, DBL

SUBJECT: MEETING WITH TVA ON DECEMBER 18, 1985 TO DISCUSS RESPONSE TO 10CFR50.54 (f) LETTER ON BROWNS FERRY NUCLEAR PLANT

On Wednesday, December 18, 1985, NRC representatives from NRR, IE and Region II met with the TVA staff to be briefed on TVA's proposed response to NRC's 10CFR50.54 (f) letter to TVA of September 17, 1985 on those issues relating to the Browns Ferry Nuclear Plant. A list of attendees is attached as Enclosure 1. The NRC letter transmitted the most recent SALP report on the TVA facilities and requested TVA to respond to a number of staff concerns regarding: 1) corporate activities; 2) the Sequoyah Nuclear Plant; 3) the Watts Bar Nuclear Plant; and 4) the Browns Ferry Nuclear Plant. By letter dated November 1, 1985, TVA submitted Volumes I and II of the "Nuclear Performance Plan" addressing the corporate and Sequoyah issues. Volumes III and IV will be submitted in early 1986 to address the Browns Ferry and Watts Bar issues, respectively.

The purpose of the meeting was to be briefed by TVA on the general approach of the responses to the Browns Ferry concerns and to receive general NRC comments on the Plan. TVA's presentation followed the agenda in Enclosure 2.

TVA has concluded that the problems highlighted by NRC at Browns Ferry stemmed from a number of causes, one of which was inadequate management control. To correct this situation, TVA has made significant management changes, including replacement of the site director, the plant manager, the maintenance superintendent and the operations supervisor. Another cause of the problems was lack of a comprehensive site master schedule; planning and scheduling has not controlled the functioning of the operations, maintenance, outage, engineering design, procurement, quality assurance, support services and other site groups into an integrated program. Another identified cause of problems was poor configuration control; drawings did not always reflect "as-built" plant conditions. TVA's position is that it now knows and understands the problems at Browns Ferry and the underlying causes of these problems and is taking action to correct the problems and causes.

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Following the TVA presentation, the NRC staff caucused to discuss general reactions and comments. Since the specific detailed response to NRC's letter will not be submitted for another two months (about mid-February 1986), we emphasized to TVA that our comments were general in nature; specific responses would be based on review of the Browns Ferry submittal (Volume III of TVA's "Nuclear Performance Plan"). Our comments on TVA's presentation were:

- The presentation did not indicate the interrelationship of the plant organization with TVA's Nuclear Safety Review Staff (NSRS) and the Employee Concerns Program. It was not indicated how TVA will disposition issues raised through these channels.
- 2. TVA needs to present schedules for completing those proposed actions which have not been accomplished. For any corrective actions which TVA does not expect to complete prior to startup of a unit, there needs to be clear justification.
- 3. There has been a perception that the Engineering Design has frequently not completed design and drawings for plant modifications and change requests sufficiently in advance of scheduled plant outages so that materials, work plans and craftsmen work schedules were complete prior to the outage. The submittal should describe how Engineering Design will support the plant organization, the interrelationship with the plant engineering staff and the management and control - including configuration control - of Engineering Design.
- 4. TVA presented many actions and programs which are being revised, initiated or changed to correct identified problems. The submittal should identify what initiatives are new, how the proposed or newly implemented positions and programs differ from what has existed at the plant in the past, the previous vs new management organization and management control programs, etc. For all the new initiatives and programs, TVA should discuss how it expects the enhancements, changes, revised programs and different approach will correct the problems identified in the SALP report and NRC letter.
- 5. The submittal should define the duties, responsibilities and organizational status of the proposed onsite independent safety engineering group, compared to the requirements in NUREG-0737, Item I.B.1.2.
- 6. In the presentation, TVA had stated that management practices and controls are or will be in place to ensure that there is a clear definition and monitoring of performance goals. The submittal should identify what these performance goals are and provide a status report on implementation of the program and a schedule for implementing and achieving the goals.

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Daniel R. Muller

- 7. The presentation on qualifications of key management personnel noted that some personnel had completed SRO equivalence training. The submittal should define what this training encompasses.
- 8. The presentation stated that "a significant program is in progress to upgrade operating procedures and technical specifications." Define what is meant by this and what will be the status of this upgrade at the time of proposed startup for Unit 2.
- 9. The Superintendent for Operations/Engineering appears to have a wide range of duties, apparently being responsible for all plant functions other than maintenance (plant operations, engineering and technical support, compliance, health physics, security, power stores, training, medical, administrative services, planning and scheduling, interaction with the outage group and engineering design, etc.). With the increased workload associated with the operational readiness program, discuss how the announced objective of having more supervisory involvement in field activities can be achieved for this position.
- 10. The submittal should provide a clear understanding of TVA's course of action on developing an integrated schedule for plant modifications and the stated program to "establish and use a site master schedule."

As part of the presentation, TVA noted that all of the short-term and most of the long-term actions required by the Regulatory Performance Improvement Program (RPIP) had been completed. Both TVA and NRC have concluded that RPIP did not identify all critical problems. TVA proposes to incorporate the actions in RPIP that have not been completed into the Nuclear Performance Plan. However, TVA is required to implement the RPIP by a Confirmatory Order issued by Region II. We will advise TVA regarding close out of the Confirmatory Order.

TVA had requested an INPO evaluation of the corporate aspects of the Nuclear Performance Plan. The exit interview was held December 13, 1985. We requested to meet with TVA to discuss INPO's evaluation. The TVA staff indicated that they would be ready to discuss this in about 3 weeks.

Original signed by char

Richard J. Olark, Project Manager BWR Project Directorate #2 Division of BWR Licensing

Enclosures: As Stated

cc: See attached list



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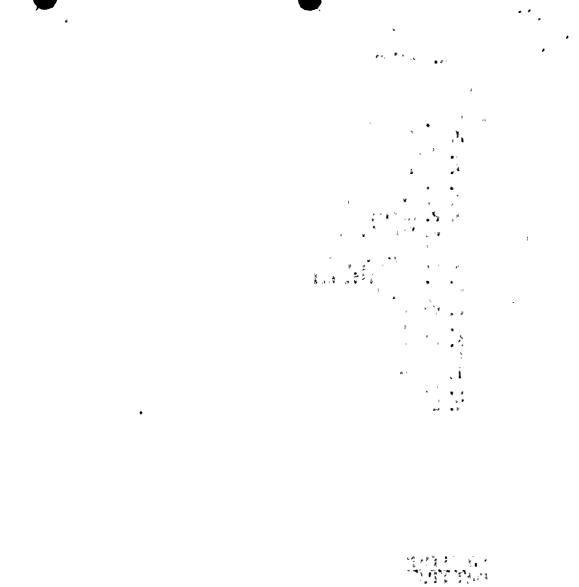
cc:	Η.	R. Denton
	Н.	L. Thompson
		Bernero
	J.	M. Taylor
		B. Hayes
		N. Grace, RII
	D.	R. Muller
	Β.	J. Youngblood
	J.	Stolz
	R.	W. Walker, RII
	D.	M. Verrelli, RII
	L.	Spessard
	R.	Wessman
	С.	Upright
	s.	Richardson
	C.	Stahle
	т.	Kenyon
	R.	Clark

W. Long

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NAME	:RJCTark:csp		:LSpessard			•	*********
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Mr. Hugh G. Parris Tennessee Valley Authority

cc:

H. S. Sanger, Jr., Esquire General Counsel Tennessee Valley Authority 400 Commerce Avenue E 11B 330 Knoxville, Tennessee 37902

Mr. Ron Rogers Tennessee Valley Authority 400 Chestnut Street, Tower II Chattanooga, Tennessee 37401

Mr. Charles R. Christopher Chairman, Limestone County Commission Post Office Box 188 Athens, Alabama 35611

Ira L. Meyers, M.D. State Health Officer State Department of Public Health State Office Building Montgomery, Alabama 36130

Mr. K. W. Whitt E3A8 400 West Summit Hill Drive Tennessee Valley Authority Knoxville, Tennessee 37902

Regional Administrator, Region II U. S. Nuclear Regulatory Commission 101 Marietta Street, Suite 3100 Atlanta, Georgia 30303

Mr. Steven Roessler U. S. Nuclear Regulatory Commission Reactor Training Center Osborne Office Center, Suite 200 Chattanooga, Tennessee 37411 Browns Ferry Nuclear Plant Units 1, 2, and 3

James A. Coffey Site Director, BFNP Tennessee Valley Authority Post Office Box 2000 Decatur, Alabama 35602

Resident Inspector U. S. Nuclear Regulatory Commission Route 2, Box 311 Athens, Alabama 35611

Mr. Donald L. Williams, Jr. Tennessee Valley Authority 400 West Summit Hill Drive, W10B85 Knoxville, Tennessee 37902

Robert L. Lewis, Manager, BFNP Tennessee Valley Authority Post Office Box 2000 Decatur, Alabama 35602

December 18, 1985 TVA/NRC - Browns Ferry SALP

#### Attendance

#### Name

C. C. Mason R. J. Mullin Floyd S. Cantrell Gerald Paulk S. P. Weise H. Thompson R. L. Spessard R. D. Walker R. P. Denise S. R. Maehr R. L. Lewis W. C. Bibb T. F. Ziegler John Raulston J. W. Hufham B. J. Youngblood D. R. Muller L. P. Crocker D. M. Verrelli Dick Clark T. P. Bragg G. R. Hall L. E. Martin R. W. Cantrell Craig Beasley D. R. Nichols R. E. Alsup Michael Hellums Ronald E. Rogers Chris Riedl

#### **Organization**

TVA - Deputy Manager of P&E (NUC) TVA - QA Manager NRC - Region II NRC - Browns Ferry NRC - Region II NRC - NRR NRC - IE NRC - Region II TVA - P&E (NUC) TVA - Browns Ferry TVA - Browns Ferry, Plant Manager TVA - Browns Ferry, Site Director TVA - Browns Ferry TVA - Browns Ferry TVA - Licensing NRC/NRR/PD #4 NRC/NRR/DBL NRC/NRR/PAFO NRC - Region II NRC - NRR TVA - BLN, Plant Superintendent (O&E) TVA - Browns Ferry, Design Services TVA - P&E (NUC) TVA - OE Manager TVA - Information Office TVA - OGC TVA - Licensing TVA - Licensing; TVA - Licensing TVA - Licensing



# Enclosure 2

#### AGENDA

## BROWNS FERRY NUCLEAR PERFORMANCE PLAN - VOLUME III

December 18, 1985 Missionary Ridge Place, Ridge Room 8:30 a.m. – 12 noon

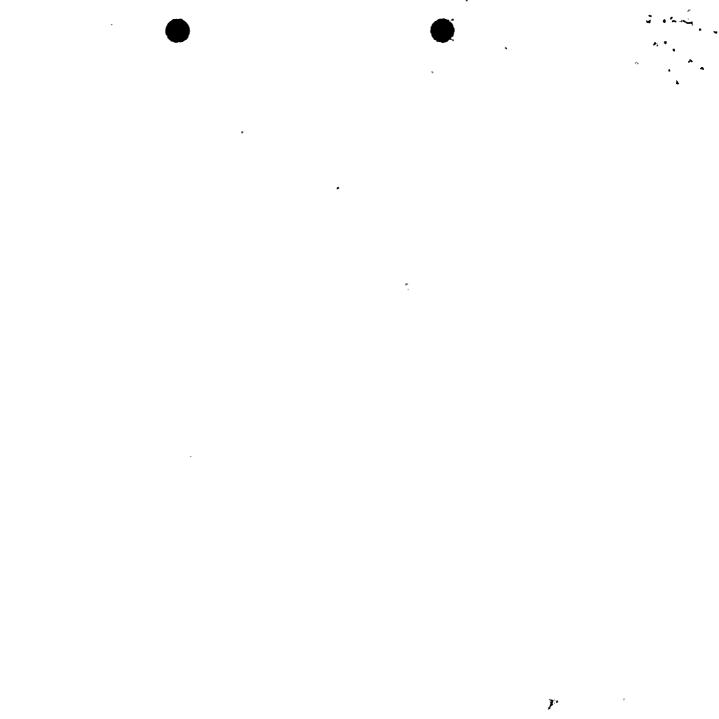
Introduction/Opening Remarks

BFN Nuclear Performance, Plan

- o Major Objectives of Meeting
- o Underlying Causes of Problems at BFN
- o Approach to BFN Performance Plan
- o Actions/Improvements Taken or Completed
  - in Key Program Areas
- o Conclusions

J. W. Hufham

T. F. Ziegler/ W. C. Bibb/R. L. Lewis



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